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UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

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UNITED STATES OF AMERICA,

Plaintiff,

v.

ADAM MICHAEL KELLY,

Defendant.

NO. CR20-5241-BHS

**INFORMATION
(FELONY)**

The United States Attorney charges that:

COUNT 1

(Possession of Schedule III Controlled Substances with Intent to Distribute)

On or about March 28, 2019, in the City of Port Townsend, Jefferson County, within the Western District of Washington, and elsewhere, the defendant, ADAM MICHAEL KELLY, did knowingly and intentionally possess, and aid and abet the possession of, with intent to distribute, substances controlled under Title 21, United States Code, Section 812, to wit: Oxandrolone, Methandienone, Stanozolol, and Testosterone.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(E)(i) and Title 18, United States Code, Section 2.

COUNT 2**(Drug User in Possession of Firearms)**

On or about March 28, 2019, in the City of Port Townsend, in Jefferson County, within the Western District of Washington, and elsewhere, the defendant, ADAM MICHAEL KELLY, knowing that he was an unlawful user of a controlled substance as defined in Title 21, United States Code, Section 802, did knowingly possess firearms, that is:

1. Glock 30 .45 caliber firearm, serial number HX6621;
2. Osprey .45 caliber silencer, serial number OSP45-39987;
3. Winchester 12-gauge shotgun, serial number L3657132;
4. Bersa model Thunder .22 caliber, serial number G72621;
5. Bushmaster AR-15, serial number BK5056379;
6. Remington 700, serial number RRO1973G;
7. Glock 380 Model 42, serial number ACZY188;
8. Glock Model 17 9 mm, serial number ACDD177; and
9. Octane suppressor, serial number OCT 45-10231,

said firearms having been shipped and transported in interstate commerce.

All in violation of Title 18, United States Code, Sections 922(g)(3) and 924(a)(2).

ASSET FORFEITURE ALLEGATION

The allegations contained in Counts 1 and 2 of this Information are hereby realleged and incorporated by reference for the purpose of alleging forfeiture. Upon conviction of the offense alleged in Count 1, the defendant ADAM MICHAEL KELLY shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any property constituting, or derived from, proceeds he obtained from that offense, as well as any property that facilitated that offense. Upon conviction of the offense alleged in Count 2, the defendant shall forfeit to the United States, pursuant to Title 18, United


1 States Code, Section 924(d)(1), by way of Title 28, United States Code, Section 2461(c),
2 any firearms and associated ammunition involved in the offense.

3 **Substitute Assets.** If any of the above-described forfeitable property, as a result of
4 any act or omission of the defendant,

- 5 a. cannot be located upon the exercise of due diligence;
6 b. has been transferred or sold to, or deposited with, a third party;
7 c. has been placed beyond the jurisdiction of the Court;
8 d. has been substantially diminished in value; or,
9 e. has been commingled with other property which cannot be divided without
10 difficulty; it is the intent of the United States, pursuant to Title 21, United
11 States Code, Section 853(p), to seek the forfeiture of any other property of
12 the defendant, up to the value of the above-described forfeitable property.

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14 DATED this 20th day of July, 2020.

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18 BRIAN T. MORAN
United States Attorney

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21 S. KATE VAUGHAN
22 Assistant United States Attorney

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25 WILLIAM DREHER
26 Assistant United States Attorney
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